

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

THE INDEPENDENCE PROJECT, INC.,
a New Jersey Non-Profit Corporation,

Plaintiff,

vs.

Case No.: 2:20-cv-00355

BENSALEM ASSOCIATES, L.P., a
Pennsylvania Limited Partnership,

Defendant.

STIPULATION FOR DISMISSAL WITH PREJUDICE

Plaintiff and Defendant, pursuant to the Federal Rules of Civil Procedure, hereby move to dismiss this action with prejudice, a resolution of all matters in dispute having been made pursuant to a Settlement Agreement executed between the parties. The parties have stipulated in their agreement that the Court retain jurisdiction to enforce the terms and conditions of the Settlement Agreement.

Respectfully Submitted,

/s/John P. Fuller

John P. Fuller, Esq., *pro hac vice*
Fuller, Fuller & Associates, P.A.
12000 Biscayne Boulevard, Suite 502
North Miami, FL 33181
Telephone: (305) 891-5199
Facsimile: (305) 893-9505
jpf@fullerfuller.com

and

David S. Dessen, Esq.
PA Bar No. 17627
Dessen, Moses & Rossitto
600 Easton Road
Willow Grove, PA 19090
Telephone: (215) 658-1400
Facsimile: (215) 658-2879
ddessen@dms-lawyer.com
Attorneys for Plaintiff

Date: **September 24, 2021**

/s/Daniel R. Utain

Daniel R. Utain, Esq.
Kaplin, Stewart, Meloff, Reiter & Stein, P.C.
910 Harvest Drive
Blue Bell, PA 19422-0765
Telephone: (610) 941-2582
Facsimile: (610) 684-2032
dutain@kaplaw.com

Attorneys for Defendant

Date: **September 24, 2021**